

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PROPOSED REVISION OF RULES REGARDING)
THE PROVISION OF WHOLESALE WATER) CASE NO. 2011-00419
SERVICE BY THE CITY OF VERSAILLES TO)
NORTHEAST WOODFORD WATER DISTRICT)

COMMISSION STAFF'S REQUEST FOR INFORMATION
TO NORTHEAST WOODFORD WATER DISTRICT

Pursuant to 807 KAR 5:001, Northeast Woodford Water District ("Northeast Woodford District") shall file with the Commission no later than March 30, 2012 the original and 10 copies of the following information, with a copy to all parties of record. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Northeast Woodford District shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to

which Northeast Woodford District fails or refuses to furnish all or part of the requested information, Northeast Woodford District shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure its legibility. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

1. Provide the minutes of each Northeast Woodford District Board of Commissioner's meeting held since January 1, 1999 in which Northeast Woodford District's water purchase contract with the city of Versailles is discussed.

2. Provide the minutes of each Northeast Woodford District Board of Commissioner's meeting in which Northeast Woodford District's water purchase contract with the Frankfort Electric and Water Plant Board ("FEWPB") is discussed.

3. State the cost of:

- a. "Regional Interconnection to Frankfort Water System" project;
- b. "Regional Interconnections with Frankfort (Phase II) With a Tap On fee, Booster Pump Station and Extension Along Spring Station Road."

4. Describe how Northeast Woodford District financed the cost of each project listed in Item 3.

5. Provide the preliminary and final engineering reports, if any, on each project listed in Item 3.

6. Provide the plans and specifications for each project listed in Item 3.

7. a. State the date of the first discussions between Northeast Woodford District and FEWPB regarding for Northeast Woodford District's purchase of water.

b. Identify the party that initiated the discussions between Northeast Woodford District and FEWPB regarding for Northeast Woodford District's purchase of water.

8. Provide all correspondence between Northeast Woodford District and FEWPB in which Northeast Woodford District's purchase of water from FEWPB is discussed.

9. State whether Northeast Woodford District has or will make any payments to FEWPB for facilities necessary to deliver water to Northeast Woodford District. If yes, state the amount and purpose for each payment.

10. Refer to the Testimony of Warner A. Broughman, III at paragraph 3. State the number of "property owners who did not otherwise [have] access to a public water supply."

11. a. State the number of Northeast Woodford District customers who are expected to receive water service as a result of the construction of the projects listed in Item 3 and the purchase of water from FEWPB.

b. State the average total monthly volume that these customers are expected to purchase.

c. Explain why Northeast Woodford District could not serve these customers with water purchased from the city of Versailles.

12. Provide all documents that Northeast Woodford District provided to Bluegrass Area Water Management Council regarding the two projects listed in Item 3.

13. State whether, in the event of a disruption in service from the city of Versailles, Northeast Woodford District can use water from its connection with FEWPB to supply its entire system. Explain.

14. Identify the areas of Northeast Woodford District's distribution system that will receive water purchased from FEWPB.

15. Provide a map of Northeast Woodford District's distribution system. Indicate on this map the areas to which each water supplier will be primarily supplying water.

16. State whether the water purchased from FEWPB can be safely mixed with that purchased from the city of Versailles. Explain.

17. If water purchased from FEWPB cannot be safely mixed with that purchased from the city of Versailles, describe Northeast Woodford District's plans to avoid the mixing of the purchased waters.

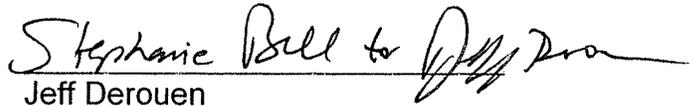
18. Provide all projections of Northeast Woodford District's expected future demand.

19. State whether Northeast Woodford District intends to purchase from FEWPB quantities of water greater than the minimum quantity specified in its water purchase agreement with FEWPB.

20. State whether FEWPB has imposed any limitation upon the quantity that Northeast Woodford District may purchase under its water purchase agreement with FEWPB.

21. State the maximum monthly quantity of water that Northeast Woodford District can physically obtain from FEWPB through the planned connection.

22. As of April 1, 2012, FEWPB will assess a rate of \$2.01 per 1,000 gallons to its wholesale customers. The city of Versailles currently charges a wholesale rate of \$2.26 per 1,000 gallons. State whether, given the differences in these wholesale rates, Northeast Woodford District will maximize its purchases from FEWPB to the fullest extent possible. Explain.



Jeff Derouen
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Public Service Commission
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DATED: MAR 16 2012

cc: Parties of Record

Case No. 2011-00419

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